

# **Exhibit B**

## **(Part 1)**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) ECF Case
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**AFFIRMATION OF ROBERT T. HAEFELE IN SUPPORT OF PLAINTIFFS'  
REQUEST FOR DISCOVERY RELEVANT TO PLAINTIFFS' THEORIES OF  
GENERAL JURISDICTION AS TO NATIONAL COMMERCIAL BANK**

1. Pursuant to the Federal Rules of Civil Procedure and Magistrate Judge Maas' January 13, 2010 Memorandum Decision and Order, I submit this affirmation in support of plaintiffs' request for an Order compelling jurisdictional discovery relevant to plaintiffs' theories of general jurisdiction as to National Commercial Bank (NCB).
2. Plaintiffs allege that NCB is not entitled to Due Process and, to the extent that it may be so entitled, NCB's various contacts with the U.S. as set forth in plaintiffs' opposition to NCB's Re-newed Rule 12(b)(2) Motion to Dismiss are sufficient, both individually and considered *in toto* (as they are required to be considered), to meet the "continuous and systematic" standard set forth in the governing case law; and that by virtue of those minimum contacts, NCB should reasonably anticipate being haled into court here. However, to the extent that the Court may find that the facts as set forth fall short of that standard, plaintiffs contend that they have nonetheless met the "sufficient start" standard necessary to demonstrate a right to jurisdictional discovery on the issues set forth in their opposition and below.
3. During a hearing before Magistrate Judge Maas on March 23, 2007, the parties and the Court discussed plaintiffs' requests for depositions of NCB/SNCB former employees and plaintiffs request for discovery regarding NCB's U.S. correspondent bank accounts. As a result of that hearing, Magistrate Judge Maas denied plaintiffs' requests for depositions, except for a 3 hour deposition of Larry Smith, and plaintiffs' requests for information regarding plaintiffs' correspondent bank accounts. (Docket Entry # 1964; see also Docket Entry # 2218, at 8-9.)
4. On April 25, 2008, plaintiffs wrote to the Court seeking additional general jurisdiction discovery, including discovery related to NCB's aviation department. (Exhibit A, letter to Judge Daniels from Justin T. Green, Esq., dated April 25, 2008, a true copy is attached hereto.) On July 11, 2008, Judge Daniels referred the dispute to Magistrate Judge Maas, with instructions for plaintiffs to advise Magistrate Maas of the additional jurisdictional discovery was plaintiffs sought. (Docket Entry # 2106).
5. In a letter from James P. Kreindler, Esq., dated August 15, 2008, with accompanying Affidavit of Robert T. Haebele and accompanying exhibits 1-22, plaintiffs sought discovery related to, inter alia, NCB's aviation department, as well as NCB/SNCB employees Thomas Krohley and Virginia Pensa, and depositions of Jorge Juco and

Abubaker Bagabir, who by that time had both offered affidavits in support of NCB's renewed motion to dismiss. (Docket Entry # 2122 through 2122-4.)

6. During a conference on April, 30, 2009, Magistrate Judge Maas denied plaintiffs' requests for additional depositions, either of NCB/SNCB employees or of the witnesses who had submitted affidavits in support of NCB's renewed motion to dismiss. (See Docket Entry #2218 at 20.)
7. On January 13, 2010, Judge Maas issued a Memorandum Decision and Order addressing various disputes between plaintiffs and NCB. (Docket Entry # 2218.)
8. In the January 13, 2010 Decision, Judge Maas recognized that "Plaintiffs may oppose NCB's motion on the basis not only on the information they have set forth in their complaints, but any additional discovery that they contend should be made available to them before Judge Daniels rules." Accordingly, Judge Maas directed the parties to provide with their opposition to NCB's Rule 12(b)(2) motion to dismiss an affidavit that identifies what additional discovery is needed and why it is needed.
9. Moreover, given plaintiffs' "legitimate concerns regarding the possible loss of evidence," Judge Maas directed "[NCB] to preserve any documents relevant to jurisdictional discovery."
10. On February 1, 2010, plaintiffs filed Objections (Docket Entries # 2220 and # 2229) to the January 13, 2010 Order, in which they argued that, in light of the recent Second Circuit decision in *Frontera Resources Azerbaijan Corp. v. State Oil Company of the Azerbaijan Republic*, 582 F.3d 393 (2d Cir. 2009) and the existing dispute as to NCB's status as an agency of the Kingdom of Saudi Arabia, discovery as to the character of NCB's relationship to the Kingdom of Saudi Arabia is now an absolute pre-condition to consideration of NCB's personal jurisdiction defense. In *Frontera*, the Second Circuit held that foreign states and their agents are not entitled to Due Process protections, and expressed serious doubt as to whether agencies of foreign states may claim Due Process rights. In light of that controlling determination, absent such discovery, it is impossible to determine, first, if NCB is entitled to claim Due Process protections at all, and second, whether the contacts of the Kingdom of Saudi Arabia are attributable to NCB.
11. Plaintiffs' Objections of February 1, 2010 also argued that the Magistrate Judge, in his January 13, 2010 Order, had erred in refusing to allow discovery regarding the NCB Aviation Division and its U.S. contacts, particularly in light of Plaintiffs' substantial corroborating proofs in this regard. The Court's comments about Plaintiffs' evidentiary proofs regarding NCB's U.S. contacts through its NCB Aviation Division indicate that the Court either misanalyzed or omitted from its analysis much of Plaintiffs' proofs, while affording improper weight to NCB's bare denials.
12. To date, this Court has not issued a ruling on plaintiffs' Objections.
13. For the reasons set forth in their prior filings concerning the general jurisdiction disputes, as well as plaintiffs' Opposition to NCB's Renewed Motion to Dismiss, plaintiffs have

made a compelling showing in favor of their repeated requests for discovery in support of their general jurisdiction theories as to NCB.

14. For all of the foregoing reasons, plaintiffs respectfully request that this Court should direct NCB to produce all documents and information relevant to plaintiffs' general jurisdiction theories – including in particular, this Court should grant discovery as to the following specific areas relevant to general jurisdiction, as set forth in plaintiffs' opposition:
  - A. Discovery as to the character and nature of NCB's relationship to the Kingdom of Saudi Arabia, including specifically whether NCB is now or was an agency of the Kingdom of Saudi Arabia at the time of the filing of any of the complaints in this litigation.
  - B. Discovery and Depositions of Frederik Crawford, John Boukley, Thomas Krohley, and Virginia Pensa regarding the following issues:
    - The closure of the NCB branch office in 1992
    - The establishment of SNCB in 1992
    - The relationship of SNCB and other NCB offices, including NCB's head office in Jeddah.
    - NCB/SNCB's relationships with other NCB-related entities in the United States
    - Any U.S. government investigation of NCB and/or Khalid bin Mafouz between 1998 and the time of the filing of the last complaint.
    - Information regarding the alleged closure of SNCB.
  - C. Depositions of Jorge Juco, Dr. Abubaker Bagabir, and Thomas Krohley regarding their statements in their Declarations and Affidavits submitted in support of NCB's motions to dismiss.
  - D. Depositions of and Discovery related to Thomas Krohley and Virginia Pensa concerning their renewable contracts and the work they performed for or related to NCB, SNCB or any related entity between 2000 and the filing of any of the complaints in this litigation, including any consultancy or other agreement between them and NCB, SNCB, or related entities; and including Thomas Krohley's responsibilities in connection with NCB's Investment Committee.
  - E. Discovery regarding NCB's correspondent agreements with financial institutions in the U.S., regarding NCB's accounts pursuant to those agreements, and including specifically information regarding any transactions through NCB's correspondent accounts for or on the behalf of al Shamal Islamic Bank, Nabil Sayadi, or any other individual or entity that has been designated by the U.S. as a SDGT.
  - F. Discovery regarding the interactive nature of NCB's interactive website for the period 2001 through until the date of filing of the last complaint, including, inter alia, statistical information about the access to the cite.

- G. Discovery regarding NCB's aviation department and NCB's or its aviation department's connections with MidEast Jet and Skyways International, as set forth in plaintiffs' Objections of February 1, 2010 (Docket Entries # 2220 and # 2229) and in the Affidavit of Robert T. Haefele filed in support of plaintiffs' motion to stay NCB's Re-newed Rule 12(b)(2) Motion to Dismiss (Docket Entry # 2122).
15. For the reasons expressed herein and in plaintiffs Opposition to NCB's Re-Newed Rule 12(b)(2) Motion to Dismiss, this jurisdictional discovery will provide direct evidence relevant to the issues of (1) whether NCB is entitled to exercise Due Process rights under the Fifth Amendment, and (2) NCB's "continuous and systematic" contacts with the United States to meet any applicable due process rights that NCB may have.
16. Affirmed in Mount Pleasant, South Carolina, on April 23, 2010.

/S/  
Robert T. Haefele, Esquire

# **EXHIBIT A**



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**BY HAND**

Honorable George B. Daniels  
United States District Judge  
United States District Court for the  
Southern District of New York  
500 Pearl Street, Room 630  
New York, New York 10007-1312

**Re: *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD)**

Dear Judge Daniels:

We write on behalf of the *Ashton* and *Burnett* Plaintiffs<sup>1</sup> to oppose the April 21, 2008 letter request of defendant National Commercial Bank ("NCB"), wherein NCB proclaims that jurisdictional discovery has concluded and seeks leave to file a renewed motion to dismiss for lack of personal jurisdiction. NCB's request should be denied because jurisdictional discovery is not complete and NCB's motion is premature. Notwithstanding NCB's efforts to close down discovery prematurely - and as much as a result of NCB's relentless efforts to narrowly circumscribe discovery - facts concerning NCB's contacts with, and conduct directed at, the

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<sup>1</sup>NCB's plan to file a renewed motion to dismiss on a consolidated basis and with extended length is also opposed by the Plaintiffs. The basis for the opposition is laid out in the *Federal Insurance* Plaintiffs' response to NCB's letter of April 21, 2008, which will be sent to the Court separately. NCB also requests to submit a consolidated memorandum of law up to 35 pages in length. Much like their proclamation that discovery is complete, this change in length is NCB's one-sided interpretation of the facts and ignores the record, the Case Management Order, as well as, the stipulation between NCB and the *O'Neill* Plaintiffs (*Attached as Exhibit C*).

April 25, 2008

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United States remain undisclosed. No Court order has brought discovery to a close and Plaintiffs' Supplemental Discovery Requests remain outstanding and Plaintiffs continue to learn facts that necessitate further inquiry.<sup>2</sup> Plaintiffs should be allowed to complete the court-ordered jurisdictional discovery and NCB should be ordered to provide appropriate and full responses to the Supplemental Discovery Requests of October 12, 2007.

NCB's unilateral proclamation by NCB that jurisdictional discovery is complete is contrary to previous Court orders. NCB wrongly relies on the decision issued by Judge Maas on May 1, 2007. In that decision, which was narrowly tailored to the issues before Judge Maas—namely the 1998 Saudi Arabian Monetary Agency (“SAMA”) Audit of NCB and transfers to any identified terrorist - Judge Maas stated “I decline to direct any further discovery (**not previously ordered**) related to NCB.” (*Attached as Exhibit A*). On December 20, 2007, Your Honor affirmed two decisions of Judge Maas regarding discovery and neither decision stated that jurisdictional discovery was complete. NCB, however, erroneously claims your Order closed discovery. Further, on December 26, 2007, Judge Maas issued another decision concerning the timing of the Plaintiffs' responses to contention discovery NCB had served, stating: “The plaintiffs retain the right to revise or supplement those answers [to the contention interrogatories], of course, should Judge Daniels (or I) permit them to engage in further discovery concerning NCB's alleged aviation business.” In that order Judge Maas recognizes that a discovery dispute between the Plaintiffs and NCB is pending before the Court and demonstrates at least implicitly that Judge Maas had not previously closed discovery.

Plaintiffs' served Supplemental Discovery Request on October 12, 2007 (*Attached as Exhibit B*). These discovery requests addressed two very discrete issues: NCB's holding of a bank account wherein assets of Osama Bin Laden are held and NCB's involvement in the aviation industry here in the United States. On November 13, 2007, NCB objected to the Supplemental Discovery Requests and refused to produce any documents. On December 26, 2007, Plaintiffs filed a motion with the Court to compel document production, which NCB opposed. Plaintiffs' motion to compel the production of documents remains pending before the Court.

One of the two issues that is the subject of the Supplemental Discovery Request, came to light because of the ongoing discovery with another defendant in the case, the Saudi Bin Laden Group (“SBG”). This example highlights, yet again, the interrelationships of the defendants in this case. Notably, NCB never disclosed it was holding an account which contains Osama Bin Laden's money. Nor has it admitted to having any business in the United States, other than its subsidiary SNCB which allegedly closed shortly before the September 11<sup>th</sup> attacks.

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<sup>2</sup>For example, although never disclosed by NCB, the Plaintiffs have recently learned in discovery from another defendant that NCB has an account wherein proceeds of Osama Bin Laden have been kept since April 2000. This previously undisclosed fact has become the subject of further inquiry.



April 25, 2008

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NCB claims that the discovery requests are not legally sufficient as Plaintiffs “have not shown the specific and jurisdictionally ‘material fact[s]’ that they contend further discovery would establish.” Notwithstanding the fact that the Plaintiffs should not be placed under the unreasonable burden of simultaneously including with every single discovery request a statement of why each request is reasonably calculated to lead to the discovery of admissible evidence. The instance of discovery under review here are poor examples for NCB to raise because the importance of the discovery under review is clear and the requests were particularly specific. Regarding the request concerning the account protecting Osama Bin Laden’s financial assets, Plaintiffs specifically named the account holders and an account number as referenced in documents provided by the Saudi Bin Laden Group.<sup>3</sup> The Plaintiffs provided ample material facts for NCB to produce all relevant documents on both their aviation business here in the United States and the bank account containing Osama Bin Laden’s funds. NCB’s refusal to answer has unnecessarily prolonged discovery.

The Supplemental Discovery Request regarding NCB’s activity in aviation businesses in the United States are essentially a refinement of requests 20 and 56 from the Original Discovery Request of February 18, 2005. Plaintiffs were very specific in the corporate entities, specific N-registered aircraft, and the names of the Federal Aviation Administration Registered Airman. These material facts were provided to NCB again when the plaintiffs complied with contention discovery on November 2, 2007 and February 1, 2008. Within those responses were documents demonstrating the links between NCB and all the entities, aircraft and individuals contained in our Supplemental Discovery Requests pertaining to the aviation business.

However, rather than responding to the Plaintiffs’ Supplemental Discovery Requests, instead NCB includes with its April 21, 2008 letter to this Court a newly acquired affidavit of Dr. Abubaker Ali Bagabir, the head of Finance and Accounting at NCB in Jeddah. In the affidavit, Dr. Bagabir makes a denial of any direct ownership, subsidiary or interest in any of the twelve aviation companies listed in Plaintiffs’ Supplemental Discovery Request. Plaintiffs are in possession of documents that directly contradict Dr. Bagabir and have provided these documents to NCB.<sup>4</sup> Particularly inasmuch as NCB has put Dr. Bagabir and his assertions in question and will very likely rely upon his statement in response support of any renewed motion to dismiss, the Plaintiffs are certainly entitled to the opportunity to conduct a deposition regarding the assertions he makes in his declaration. Similarly, NCB should be compelled to provide documents as requested in Plaintiffs Supplemental Discovery Request.

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<sup>3</sup> NCB, in its refusal to provide any documents relating to the Osama Bin Laden Trust account, claims that SBG has already provided all relevant documents. For its part, SBG claims that further documents relating to the Trust Fund account at NCB are out of its control. See SBG letter of December 28, 2007, page 9.

<sup>4</sup> Attached to this letter with Exhibits A and B, is the Affidavit of John Fawcett and the supporting documents of material facts regarding Plaintiffs Supplemental Discovery Request of NCB’s activity in the aviation business in the United States.

April 25, 2008

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Most importantly, it is obvious that the aviation business conducted in the United States either for NCB or under the control of NCB, is at the heart of the general jurisdictional arguments. Likewise, for the Osama Bin Laden bank account, which provided financial support by protecting money of the world's most notorious terrorist, qualifying as a relevant fact for specific long arm jurisdiction.

Further, NCB states that Plaintiffs' requests are unauthorized and not legally sufficient to prevent NCB from renewing its motion to dismiss because plaintiffs have not shown material facts that further discovery would establish. For this theory, NCB cites, *Melnick v. Adelson-Melnick* a divorce case, a Federal diversity case which holds that personal jurisdiction was lacking under the New York long-arm statute over a non-resident former wife. This case cited by NCB is not analogous to the international complex litigation that stands before this Court. Moreover, at this time there is no motion for summary judgment before this Court. As the Court states in *Daventree Limited v. Republic of Azerbaijan*, 349 F.Supp. 2d 736, 761 (S.D.N.Y. 2004), "it is within a District Court's discretion to determine whether a plaintiff is entitled to conduct jurisdictional discovery and to "devis[e] the procedures to ferret out the facts pertinent to jurisdiction." See *APWU v. Potter*, 343 F.3d 619, 627 (2<sup>nd</sup> Cir. 2003). A plaintiff should be provided with "ample opportunity to secure and present evidence relevant to the existence of jurisdiction" through jurisdictional discovery. See *id.* (quoting *Phoenix Consulting, Inc. v. Republic of Angola*, 216 F.3d 36, 40 (D.C. Cir. 2000)). The facts of both the aviation business and the Osama Bin Laden bank account would both state a basis for the exercise of jurisdiction over NCB.

Accordingly, NCB's request for leave to file a renewed motion to dismiss for lack of personal jurisdiction should be denied until jurisdictional discovery is complete.

Respectfully submitted,

**KREINDLER & KREINDLER, LLP**

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**MOTLEY RICE LLC**

April 25, 2008

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cc: **BY HAND**  
Honorable Frank Maas, U.S.M.J.

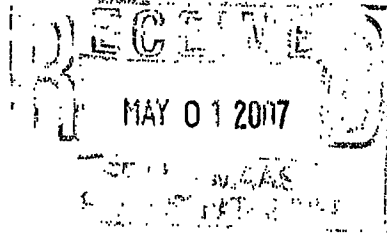
**BY EMAIL**  
Mitchell R. Berger, Counsel for NCB

**EXHIBIT A**



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April 30, 2007

The "wordsmithing" allegation set forth in this letter is not new. (See 3/23/07 Tr. at 3-4) ("I got the sense that NCB might be taking advantage of word-smithing."). Moreover, I believe that the colloquy at the 3/23/07 conference sufficiently established the parameters of what was being sought by the plaintiffs and the Court. I have reviewed the audit report prepared by Arthur Anderson that NCB submitted for my review, and which has been represented to be the only document potentially responsive to the plaintiffs' discovery requests relating to an audit report. Although the report is in light of Your Honor's March 23, 2007 decision ordering an in-camera review of the styled a NCB audit that plaintiffs have sought to obtain, and in light of the wordsmithing in which "Special

plaintiffs believe NCB continues to engage, we offer the following information to assist you in examining both the relevance and the responsiveness of the materials NCB is providing to you. Although plaintiffs' counsel have not been given the opportunity to examine what is being submitted for Your Honor's review, based on the minimal description alone, plaintiffs believe NCB continues to parse words and use improper semantics to avoid production of the three information plaintiffs have long sought, and instead is producing a different document than what plaintiffs requested. I have received which relates to the issues presently before this Court concerning

As you know, plaintiffs understand that an audit or process review<sup>1</sup> of NCB was NCB. Accordingly, I decline to direct any further discovery (not previously ordered)

<sup>1</sup> Given the defendant's apparent proclivity for parsing of words, plaintiffs wish to be clear that, though we have generally referred to the document sought as an "audit," we have never intended to mean the term in any manner other than that the document is some form of a review or investigation into the process or financial transactions. Any narrowing of the definition by NCB, particularly during the discovery process, would be purely deceptive.

related to NCB.\*

\* Mr. Webman should confer my Chambers to make arrangements to retrieve the materials submitted for in camera review.

**EXHIBIT B**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) ECF Case
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*This document relates to:*

*Kathleen Ashton v. Al Qaeda Islamic Army, Case No. 02-CV-6977 (GBD) (S.D.N.Y.)  
Thomas E. Burnett, Sr. v. Al Baraka Investment & Development Corp., Case No. 03-CV-9849 (GBD) (S.D.N.Y.)*

**PLAINTIFFS' SUPPLEMENTAL REQUESTS FOR PRODUCTION OF  
DOCUMENTS DIRECTED TO THE NATIONAL COMMERCIAL BANK**

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PLAINTIFFS' SUPPLEMENTAL REQUEST FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO THE NATIONAL COMMERCIAL BANK

Plaintiffs in Ashton v. Al Qaeda Islamic Army, 02 CV 6977 (GBD) and Burnett v. Al Baraka Investment & Develop. Corp., 03 CV 9849 (GBD) in the consolidated actions comprising In Re: Terrorist Attack On September 11, 2001, 03 CV 1570 (GBD), propound on National Commercial Bank ("NCB") the following Jurisdictional Requests for Production of Documents to be answered fully and under oath, pursuant to Rule 34 of the Federal Rules of Civil Procedure, within 30 days of their receipt.

The "Instructions" and "Definitions" set forth in the Plaintiffs' First Set of Requests for Production of Documents Directed to the National Commercial Bank are incorporated herein by reference.

PLAINTIFFS' SUPPLEMENTAL REQUEST FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO THE NATIONAL COMMERCIAL BANK

- 1.) Provide all documents pertaining to NCB's business activities relating to the airline industry in the United States. This should include but is not limited to:
  - a) NCB's ownership and/or investments in Southwest Airport Services Inc., Global FBO Holdings, Inc., Ellington MTA, Inc., Skyways Aircraft Leasing, Inc., Skyways International, Inc., Mid East Jet, Inc., and Mid-East Jet, Inc.;
  - b) N-registered aircraft, including N777AS, N371BC, N767KS, N757MA, N737GG;
  - c) FAA listed Airmen including: Ashraf Jawaidd Khan aka Jawaidd K. Ghouri, Mohamed Mustafa al Hanno, Shams Hassan Khan, Mark Thomas Ramsey, Salman Rasheedi, Muhammad Tahsin.



PLAINTIFFS' SUPPLEMENTAL REQUEST FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO THE NATIONAL COMMERCIAL BANK

- 2.) Provide all documents from 1993 to the present relating to any accounts and/or holding of the assets of shares held in trust by the Supervisory and Audit Board of the Mohamed Binladen Company, Mohmaed Saleh Bahareth, Khalaf Ahmed Ashour, or Mohamed Noor Rahimi for Osama Bin Laden. This should include but not be limited to account # 10149761000107.

Dated: October 12, 2007  
New York, NY

Respectfully submitted,

KREINDLER & KREINDLER, LLP

By: 

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MOTLEY RICE LLC

By: \_\_\_\_\_

/s/

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**EXHIBIT C**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3-8-05

1016-5

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re TERRORIST ATTACKS on  
SEPTEMBER 11, 2001

03 MDL 1570 (RCC)  
ECF Case

*This document relates to:*

*O'Neill v. Al Baraka Inv. & Dev. Corp.*, 04-CV-1923 (RCC)  
*New York Marine & General Ins. Co. v. Al Qaida*, 04-CV-6105 (RCC)  
*Continental Casualty Co. v. Al Qaeda Islamic Army*, 04-CV-5970 (RCC)  
*Cantor Fitzgerald & Co. et al. v. Akidu Bank Private Ltd.*, 04-CV-7065 (RCC)

**STIPULATION AND ORDER SETTING SCHEDULE FOR  
THE NATIONAL COMMERCIAL BANK TO RESPOND TO COMPLAINTS**

IT IS HEREBY STIPULATED AND AGREED, by and between undersigned counsel for the O'Neill, New York Marine, Continental Casualty, and Cantor Plaintiffs (collectively, "Plaintiffs") and for Defendant The National Commercial Bank ("NCB"), subject to the approval of the Court, as follows:

1. The Court previously approved Stipulations by and between counsel for Plaintiffs and NCB that would have required NCB to move to dismiss or otherwise respond to Plaintiffs' complaints within forty-five (45) days from the date on which the Court decided NCB's motions to dismiss in *Burnett* (03-CV-9849) and *Ashton* (02-CV-6977). See MDL Dkt. #532 (*Cantor*); MDL Dkt. #542 (*O'Neill*); MDL Dkt. #621 (*NY Marine* and *Continental Casualty*).
2. On January 18, 2005, the Court denied without prejudice NCB's motions to dismiss in *Burnett* and *Ashton*, with leave to renew NCB's motion to dismiss those actions after completing limited jurisdictional discovery. MDL Dkt. #632 (Opinion and Order). On February 1, 2005, NCB filed a motion for reconsideration of the January 18 Opinion and Order, and that motion remains pending. See MDL Dkt. #648.
3. Subject to the disposition of NCB's pending motion for reconsideration, NCB shall file a consolidated motion to dismiss, or otherwise file individual responses to, the Complaints in

O'Neill, New York Marine, Continental Casualty, and Cantor on the same date that NCB renews its motion to dismiss the *Burnett* and *Ashton* actions, as allowed by the Court's January 18, 2005, Opinion and Order. The memorandum of law in support of NCB's consolidated motion shall not exceed 25 pages in length.

4. Plaintiffs shall have sixty (60) days from the date on which it is served with NCB's consolidated motion to dismiss to file their consolidated response to NCB's motion to dismiss. Plaintiffs' consolidated memorandum of law in response to NCB's consolidated motion shall not exceed 25 pages in length.

5. NCB shall have 30 days thereafter to file a consolidated reply to Plaintiffs' opposition. NCB's consolidated reply memorandum of law shall not exceed 10 pages in length.

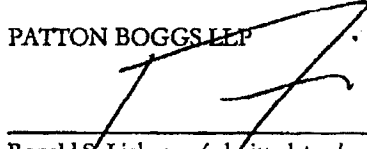
6. The foregoing schedule is without waiver of any of NCB's defenses or of NCB's pending motion for reconsideration in the *Burnett* and *Ashton* actions.

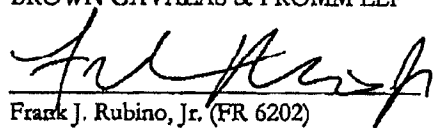
Dated: ~~February~~ <sup>March</sup> 7, 2005

Respectfully submitted,

PATTON BOGGS LLP

BROWN GAVALAS & FROMM LLP

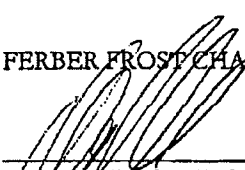
  
Ronald S. Liebman (admitted *pro hac vice*)  
Mitchell R. Berger (MB 4112)  
Ugo Colella (admitted *pro hac vice*)  
2550 M Street, N.W.  
Washington, D.C. 20037  
Phone: (202) 457-6000  
Fax: (202) 457-6315

  
Frank J. Rubino, Jr. (FR 6202)  
355 Lexington Avenue  
New York, New York 10017  
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Kenneth L. Adams (*pro hac vice* pending)  
Richard W. Fields  
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*The Port Authority of New York and New Jersey,*  
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LAW OFFICES OF JERRY S. GOLDMAN  
& ASSOCIATES, P.C.

Jerry S. Goldman  
111 Broadway  
13<sup>th</sup> Floor  
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Phone: (212) 242-2232  
Fax: (212) 346-4665

*Counsel for Plaintiffs*  
*John P. O'Neill et al.*

FERBER FROST CHAN & ESSNER, LLP

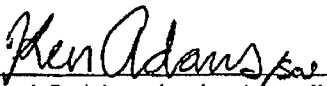
---

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New York, New York 10006  
Phone: (212) 242-2232  
Fax: (212) 346-4665

*Counsel for Plaintiffs*  
*John P. O'Neill et al.*

Dated: New York, New York  
March 7, 2005

SO ORDERED:

  
Richard C. Casey  
U.S.D.J. 



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD-FM)
---	----------------------

*This document relates to:*

*Ashton v. Al Qaeda Islamic Army*, 02-CV-6977

*Burnett v. al Baraka*, 03-CV-9849

AFFIDAVIT OF JOHN FAWCETT IN SUPPORT OF PLAINTIFFS RESPONSE TO LETTER  
OF NATIONAL COMMERCIAL BANK OF APRIL 21, 2008

STATE OF NEW YORK     )  
  ) ss.:  
COUNTY OF NEW YORK    )

JOHN FAWCETT, being duly sworn, deposes and says:

1. For over five years, I have been working under contract for Kreindler & Kreindler LLP as a researcher in the case of *Kathleen Ashton v. al Qaeda Islamic Army et al.*
2. The following is a representative selection of the documents provided to the National Commercial Bank (NCB) on November 16, 2007 and February 1, 2008. The documents pertain to NCB's aviation business in the United States.
3. Pages from the website of Saudi Arabian Airlines which lists NCB Aviation as a customer under Private Aviation Companies. ASH007977-7978. See Attachment 1.
4. A fax from NCB Aviation, dated December 23, 1997 with address of PO Box 9935, Jeddah, Saudi Arabia and referencing Captain al Hanno. MR\_NCB000850. See


Attachment 2.

5. A fax from NCB Aviation, dated February 18, 1998, listing 13 crewmembers of NCB Aviation, including Mark Ramsey, Salman Rasheedi and Shams Hassan, and T.W. Rogers. MR\_NCB000849. See Attachment 3.
6. An NCB/Skyways International Business Card, in English and Arabic, with address of PO Box 9935, Jeddah. ASH008028-29. See Attachment 4.
7. Texas Secretary of State Inquiry as to Skyways International, Inc. with Lawrence G. Smith as Director and Chairman. ASH008003. See Attachment 5.
8. Pages from the Aero Transport Data Bank with a directory listing for Mid East Jet and Skyways International, at PO Box 9935 Jeddah and senior management listed as Kurshid Mahmood Khan. ASH007970-71. See Attachment 6.
9. State of Delaware Corporate filing for Mid-East Jet, Inc, dated June 27, 2006, noting the original filing of November 15, 1995 and signed by Khurshid Mahmood Khan. ASH010050. See Attachment 7.
10. Pages from the FAA Airmen Certification Database, with PO Box 9935, Jeddah as address of Mohamed Hanno, Mark Ramsey, Salman Rasheedi and Shams Hassan Khan. ASH008136, ASH008226, ASH008487. See Attachment 8.
11. Pages from Aircraft records acquired via FOIA from the FAA. The pages show that Mid East Jet of Delaware and of Jeddah was the owner of a N-Registered aircraft and First Security Bank acted as a trustee of the same N-Registered aircraft in the United States. T.W. Rogers and Mohamed al Hanno signed as registered owners and authorized agents of the aircraft. ASH010001, ASH010056, ASH010073, ASH010357, ASH010375-6, ASH010389. See Attachment 9.


12. Sample pages from flight tracking data acquired from the FAA which show hundreds of flights into and out of US airspace between the years 2000 and 2002. ASH010328, ASH010334-35. See Attachment 10.
13. Pages from a Southern District Texas (Houston) civil case 4:94-cv-00729, Bath v. National Commercial, et al. in which NCB claimed to hold 90 % of the outstanding shares of Southwest Airport Services, Inc. The case was settled out of court and closed on March 10, 1995. PLEAD000963-66, PLEAD00164. See Attachment 11.
14. Pages from the Texas Secretary of State demonstrating that Global FBO Holdings, Inc. is the parent of Southwest Airport Services, Inc. and Ellington MTA, Inc. ASH009010, ASH009012. See Attachment 12.
15. Pages from the U.S. Department of Defense awarding a \$16 million contract to Southwest Airport Services, Inc. ASH009266-68. See Attachment 13.

Dated: New York, New York  
April 25, 2008

Respectfully submitted,

  
\_\_\_\_\_  
John Fawcett

Sworn to before me this  
25<sup>th</sup> day of April, 2008

  
\_\_\_\_\_  
Notary Public

**EUGENIE L. MASTERSON**  
Notary Public, State of New York  
No. 30-4719641  
Qualified in Nassau County  
Term Expires October 31, 2010

# **ATTACHMENT 1**

**Pages from the website of Saudi Arabian Airlines**



الخطوط الجوية العربية السعودية  
SAUDI ARABIAN AIRLINES

We aim to please you

Choose..

Home  
About Us  
Travel  
Services  
Cargo  
Alfursan  
Tours  
Skysales  
Catering  
SV News  
Special Offers

JEDDAH	AIRLINE CODE	RIYADH
Air Afrique	RK	
Air Algerie	AH	
Air France	AF	Air France
Air India	AI	
Air Lanka	UL	Air Lanka
Air Tanzania	TC	
Alitalia	AZ	
Ariana Afghan	FG	
Biman Bangladesh	BG	Biman Bangladesh
British Airways	BA	British Airways
Cyprus Airways	CY	Cyprus Airways
Daallo Airlines	D3	
Ethiopian Airlines	ET	
Garuda	GA	Garuda
Kabo Air	KO	
KLM	KL	
Lufthansa	LH	
Malaysia Airlines	MH	
Middle East Airlines	ME	Middle East Airlines
Olympic Airways	OA	Olympic Airways
	PK	Pakistan International
	PR	Philippine Airlines
Qatar Airways	QZ	
Royal Air Maroc	AT	Royal Air Maroc
Royal Brunei	BI	
Royal Jordanian	RJ	
Singapore Airlines	SQ	
Sudan Air	SD	
Swissair	SR	
Tunis Air	TU	
Turkish Airlines	TK	Turkish Airlines
Yemen Airways	IY	
	TW	Transworld Airlines
<b>REGULAR FOREIGN AIRLINES ON-REQUEST CUSTOMERS</b>		
	AI	Air India
Cameroon Airlines	UY	
Egypt Air	MS	Egypt Air
Emirates Airlines	EK	Emirates Airlines
	ET	Ethiopian Airlines
Gulf Air	GF	Gulf Air
Iran Air	IR	
Kuwait Airways	KU	Kuwait Airways
	LH	Lufthansa
Pakistan International	PK	
	RJ	Royal Jordanian
	SD	Sudan Air

ASH007977



	SR	Swissair
Syrian Arab Airlines	RB	Syrian Arab Airlines
U.A.E. Royal Flights	GRF	U.A.E. Royal Flights
	IY	Yemen Airways
PRIVATE AVIATION COMPANIES		
Al-Mubani Aircrafts	AM	
Arabasco	AR6	Arabasco
Binladen Aviation	BTN	Binladen Aviation
Exec Air Transport	EAT	Exec Air Transport
International Aviation	IAC	International Aviation
Jet Aviation	JET	Jet Aviation
Mustafa Edrees	MEA	Mustafa Edrees
NCB Aviation	NCB	NCB Aviation
Unasco Travel	UT	
OTHERS		
Royal Saudi Air Force	RAF	Royal Saudi Air Force

Customer List Summary			
JEDHF UNIT		RUHMF UNIT	
30	Regular Airlines	13	Regular Airlines
9	On-request customers	13	On-request customers
9	Private Aviation	7	Private Aviation
1	Others	1	Others
49	Total Jeddah Customers	34	Total Riyadh Customers

Copyright © 2007 Saudi Arabian Airlines. All rights reserved.

ASH007978

## **ATTACHMENT 2**

**NCB Aviation Fax of December 23, 1997**

DEC 23 '97 05:05PM NDEEM FAROOQUI JEDDAH K S A827

P.1

## *facsimile transmittal*

Attn: [REDACTED]

Via Fax. [REDACTED]

From: **Sandy Dalit**  
NCB Aviation

No. of Pages: 1 (Incl. this)

Date: December 23, 1997

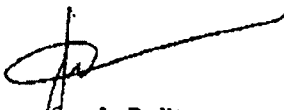
---

Dear Mr. Seguin,

As per Capt. Al-Hanno's order, please find below our complete address for courier purposes as follow:

**The National Commercial Bank**  
Aviation Department  
3<sup>rd</sup> Floor, NCB Khalidiyah Branch Bldg.  
Prince Abdullah Street, District Khalidiyah  
P.O. Box 9935 Jeddah 21423  
Saudi Arabia

Thanks and Regards,

  
**Sandy Dalit**  
Operations  
Jeddah

23-12-1997 15:12

728041

P.01

**10282**

**MR\_NCB000850**



## **ATTACHMENT 3**

**NCB Aviation Fax of February 18, 1998**

FEB-18-1998 10:25

NCB AVIATION/SKYWAYS JED.

966 2 682 4827 P.01

## *facsimile transmittal*

Attn: Mr. [REDACTED]

Via Fax. [REDACTED]

From: Sandy Dalit  
NCB Aviation

No. of Pages: 1 (Incl. this)

Date: February 18, 1998

Dear Mr. Seguin,

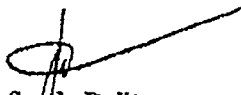
Sorry for the much-delayed response to your fax of 23 January 1998 concerning the list of names of our crew that you were asking for registration in the Executive Floor of the hotel Concorde Lafayette.

In any case, please find hereinafter the following list of our active crewmembers.

1. Capt. T.W. "Buddy" Rogers
2. Capt. Johnny Antoon
3. Capt. David Thomas
4. Capt. Mark Ramsey
5. Capt. Robert Murphy
6. Capt. Salmaan Rasheedi
7. Capt. Imtiaz Khan
8. Capt. Shams Hassan
9. Capt. Fahad Bakalka
10. Capt. Gustavo Torres
11. Capt. Jose Roche
12. Capt. Francisco Lombardi
13. Capt. Javed Latif

If you need any further information, please don't hesitate to call me at extension 35.

Thanks and Regards,



Sandy Dalit  
Secretary to Capt. Al-Hanno

10260

18-02-1998 09:23

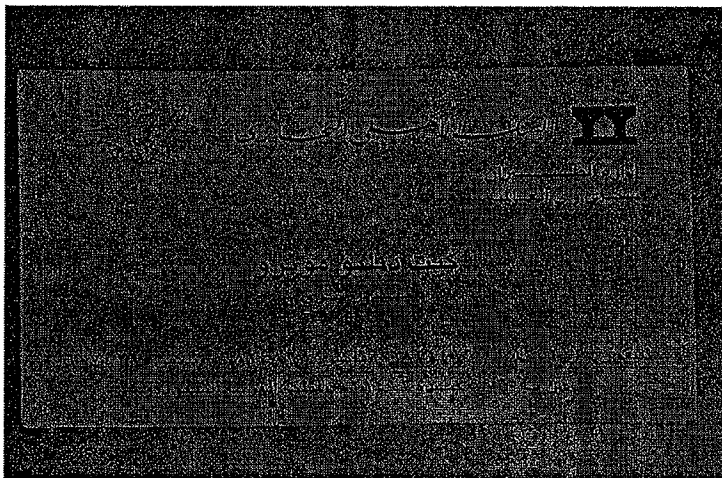
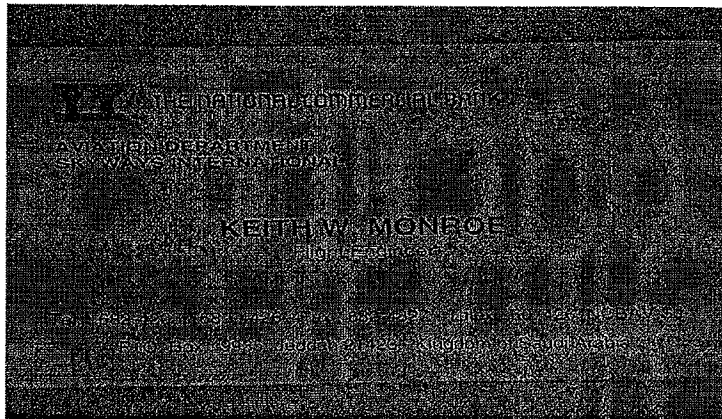
966 2 682 4827

TOTAL P.01  
✓P.01

MR\_NCB000849

## **ATTACHMENT 4**

**NCB/Skyways Business Card**



# **ATTACHMENT 5**

**Texas Secretary of State Document**


[JCS](#) | [Business Organizations](#) | [Trademarks](#) | [Accounts](#) | [Help/Feas](#) | [Briarcase](#) | [Logout](#)

BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY

**Filing Number:** 114174200      **Entity Type:** Domestic Business Corporation  
**Original Date of Filing:** February 6, 1990      **Entity Status:** Forfeited existence  
**Formation Date:** N/A  
**Tax ID:** 30119813310      **FEIN:**  
**Duration:** Perpetual  
**Name:** SKYWAYS INTERNATIONAL, INC.  
**Address:** 11 E GREENWAY PLZ STE 2806 %SUMMIT TOWER  
 Houston, TX 77046 USA

MANAGEMENT			MANAGEMENT		
Last Update	Name	Title	Address		
February 6, 1990	Adrian Smith	P	11 GREENWAY PLZ STE 2806 Houston, TX 77046 USA		
February 6, 1990	Lawrence G Smith	G	11 GREENWAY PLZ STE 2806 Houston, TX 77046 USA		
February 6, 1990	Lawrence G Smith	Director	11 GREENWAY PLZ STE 2806 Houston, TX 77046 USA		
February 6, 1990	Osair Mada	Director	11 GREENWAY PLZ STE 2806 Houston, TX 77046 USA		

[Order](#) | [Return to Search](#)

**Instructions:**  
 To place an order for additional information about a filing press the 'Order' button.

ASH008003

# **ATTACHMENT 6**

## **Aero Transport Data Bank Pages**


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[Preferences](#)
[Subscribe](#)
[Tips & Q&A](#)




 CNGI - Christine Negroni - Annual Professional [ [Log-off](#) ] [ [myATDB](#) ]

 [ [QueryBuilder](#) ] [ [QueryEvents](#) ] [ [Charts!](#) ] [ [Help](#) ]

Profile &amp; Resources check passed

 Directory records for: **Mid East Jet**

 6 directory records were found - [ [Generate Excel](#) ]

Directory records	
<b>Name</b>	Mid East Jet
<b>Legal name</b>	Mid East Jet, Inc
<b>Address</b>	PO Box 9935 Jeddah 21423 Saudi Arabia
<b>Phone</b>	+966 (2) 682 42 03
<b>Fax</b>	+966 (2) 682 48 27
<b>Senior Management</b>	Kurshid Mahmood Kahn

 ATDB Response time: 0.0593 second [ [Show Details](#) ]

Query saved

© 1997-2007 AeroTransport Data Bank

DB Updated: Tue 18 Sep 2007 16:31 UTC

ASH007970




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Mid East Jet

ATDB Search

Fetch More...

CNGL Christine Negroni - Annual Professional [ Log-off ] [ myATDB ]

[QueryBuilder](#) [QueryEvents](#) [Charts](#) [Help](#)


Profile &amp; Resources check passed

Profile for: **Mid East Jet**2 companies in genealogy tree - [\[ Generate Excel \]](#)

Name	Alias	IATA	ICAO	Country	Base	Dates	1
Mid East Jet	Kalair		XAH	USA-Texas	Houston/Jeddah	1996-	
Skyways International	Skyways Aircraft Leasing/Skyways Leasing Corporation			USA-Texas	Houston	1973-1996	

Directory and Contact records for **Mid East Jet**SubFleets for: **Mid East Jet**9 subfleets - [\[ Generate Excel \]](#)

Operator	Model	Sub-Type	Current Active	Current Leased-out	Current Inactive	Planned	Historical	Total all times	Avg Age Active	1
Mid East Jet	B.777	B.777-200 (ER)	1					1	8.8 years	
Mid East Jet	B.767	B.767-200 (ER)	1					1	11.0 years	
Mid East Jet	B.767	B.767-300 (ER)	1					1	13.9 years	
Mid East Jet	B.707	B.707-120B					3	3	n/a	
Mid East Jet	B.707	B.707-320(A)					1	1	n/a	
Mid East Jet	B.707	B.707-320C					2	2	n/a	
Mid East Jet	B.727	B.727-100	1				1	2	40.3 years	
Mid East Jet	B.757	B.757-200	1					1	10.6 years	
Mid East Jet	B.737	B.737 BBJ	1		1			2	8.6 years	
<b>TOTAL:</b>			6		1		7	14	15.5 years	

Use links above to drill down within a subfleet

**Fleet list of Mid East Jet**Airframes 1-14 of 14 - [\[ Generate Excel \]](#)

ASH007971

# **ATTACHMENT 7**

**Delaware Secretary of State Document**

SEP-15-2006(FRI) 12:08

Jarvis and Associates

(FAX)305 445 4545

P 002/002

**STATE OF DELAWARE  
CERTIFICATE FOR RENEWAL  
AND REVIVAL OF CHARTER**

The corporation organized under the laws of Delaware, the charter of which was voided for non-payment of taxes, now desires to procure a restoration, renewal and revival of its charter, and hereby certifies as follows:

1. The name of this corporation is Mid-East Jet, Inc.
2. Its registered office in the State of Delaware is located at 1209 Orange Street (street), City of Wilmington  
Zip Code 19801 County of New Castle the name of its registered agent is The Corporation Trust Company
3. The date of filing of the original Certificate of Incorporation in Delaware was November 15, 1995
4. The date when restoration, renewal, and revival of the charter of this company is to commence is the 28<sup>th</sup> day of February, 2006  
same being prior to the date of the expiration of the charter. This renewal and revival of the charter of this corporation is to be perpetual.
5. This corporation was duly organized and carried on the business authorized by its charter until the 1<sup>st</sup> day of March A.D. 2006  
at which time its charter became inoperative and void for non-payment of taxes and this certificate for renewal and revival is filed by authority of the duly elected directors of the corporation in accordance with the laws of the State of Delaware.
6. No Officers have been elected for this Corporation.

IN TESTIMONY WHEREOF, and in compliance with the provisions of Section 312 of the General Corporation Law of the State of Delaware, as amended, providing for the renewal, extension and restoration of charters the last and acting authorized officer hereunto set his/her hand to this certificate this 27<sup>th</sup> day of June A.D. 2006

By: 

Authorized Officer

Name: Khurshid Mahmood Khan

Print or Type

Title: Sale Director

State of Delaware  
Secretary of State  
Division of Corporations  
Delivered 12:00 PM 07/27/2006  
FILED 12:00 PM 07/27/2006  
SRV 060710393 - 2562363 FILE

ASH010050

# **ATTACHMENT 8**

## **FAA Airmen Certification Database Pages**

"A0841595,DANIAL PATRICK	"HIGGINS	"28 HARVEY CRESCENT	"SINGAPORE	"489390	"SINGAPORE	"WP.2.052007.052008"
"A0841606,DAVID WILLIAM	"HIGGINS	"TORWOOD HSE TORWOODHILL RD RHU	"HELENSBURGHSCOT	"CANADA	"NM."	"EU."
"A0842130,ROBERT WILLIAM	"HIGGINS	"27 EVERETT STREET	"BELLEVILLE ONT	"CANADA	"NM."	"EU."
"A0842445,MALCOLM NIGEL	"HIGH	"19 RAVENS WALK WOOTTON BASSETT	"SWINDON WILTS	"SN4 8NT	"UNITED KINGDOM	"EU.1.022007.082007"
"A0842530,JOHN BRENNER	"HIGGET	"35 RICHMOND CLOSE SOUTHWOOD	"FARBOROUGH	"GU140RH	"UNITED KINGDOM	"EU."
"A0843032,SAAD SAID	"HIAL	"3900 RAMEZAY AVE	"MONTREAL	"H3Y 3K5	"CANADA	"NM."
"A0843289,JOHN	"HIMENING	"MOZART STREET 17	"2162 AH LISSE	"NETHERLANDS	"EU."	"EU."
"A0843364,GUNTER S R	"HILDEBRAND	"TALWEG 23 A	"KRONBERG	"61476	"GERMANY	"EU."
"A0843626,GREGORY LANCE	"HILDERLEY	"8 HINTER WEINBERG	"HENGERSBERG	"D94491	"GERMANY	"EU."
"A0843720,LARRY CONLEY	"HILDERMAN	"107 LANDOVNE AVENUE	"SAU ST MARIE ONT	"CANADA	"NM."	"EU."
"A0843892,RONALD EDUARD	"HILFERNK	"606 VICTORIA AVE APT 515	"SASKATOON SASK	"CANADA	"NM."	"EU."
"A0843999,ROLE WERNER	"HILGERT	"839 ARDEN RD R2 V	"BRITISH COLUMBIA	"V9C 4Q2	"CANADA	"NM.1.042007.102007"
"A0844004,HENDRIKUS	"HILHOSST	"1594 HERMANT COURT	"MISSISSAUGA	"L5H3T2	"CANADA	"NM."
"A0844009,HANS JURGEN	"HILKE	"JM OOSTGARTEN 1	"BOXTHEUDE	"21614	"GERMANY	"EU."
"A08444914,EDUARDO LLACH	"HILL	"ALEWIJNLAAN 33	"LOOSDRECHT	"NETHERLANDS	"EU."	"EU."
"A0845187,GRAHAM STUART	"HILL	"CEEN DIV EF	"1211 GENEVA 23	"SWITZERLAND	"EU."	"EU."
"A0845393,IAN CHRISTOPHER	"HILL	"3 CALLE PONIENTE 3511	"SAN SALVADOR	"EL SALVADOR	"SO."	"EU."
"A0846076,LEE ROBINSON	"HILL JR	"ARBOR LODGE RYEFIELD DR	"LANCASHIRE	"UNITED KINGDOM	"EU."	"EU."
"A0846461,PETER CHARLES GRANT	"HILL	"BOOMBAB	"ST GEORGE	"4487	"AUSTRALIA	"WP."
"A0846898,RAYMOND	"HILL	"LAGASCA 28	"MADRID	"28001	"SPAIN	"EU.2.082007.082008"
"A0847493,ALAIN	"HILLAERT	"101 SHEARER CRESCENT	"KANATA ONT	"K2L 3V8	"CANADA	"NM."
"A0847778,UWE	"HILLER	"24 ELM CLOSE ELSHAM	"HERTS CM22 6LE	"UNITED KINGDOM	"EU."	"EU."
"A0847795,WALTER EMIL	"HILLER	"AV MARECHAL JEFFRE 49 1190	"BRUSSELS	"BELGIUM	"EU."	"EU."
"A0847843,JERGEN	"HILLESHEIM	"BUCHENWEG 1	"KANTON BASELSTADT	"GERMANY	"EU."	"EU."
"A0847899,KLAUS	"HILLGRUBER	"REUTERALLEE 44 D-61 DARMSTADT	"GYMEA BAY	"AUSTRALIA	"WP."	"EU."
"A0848092,CLYDE DONALD	"HILLIER	"5 BALLAR AVE	"D-2000 HAMBURG 1	"GERMANY	"EU."	"EU."
"A0848098,GEOFFREY KENNETH	"HILLIER	"AMISNCKSTRASSE 45	"LONDON ONTARIO	"N6C 4A1	"CANADA	"NM."
"A0848255,CLIFFORD GARY	"HILLMAN	"438 RDOUT STREET SOUTH	"REGINA SASK	"CANADA	"NM."	"EU."
"A0848454,BERNARD PAUL	"HILLS	"311 ROYAL STREET	"ECKVILLE ALBERTA	"CANADA	"NM."	"EU."
"A0848542,NORMAN JOHN	"HILLS	"RR 3	"GISTOUX	"1325	"BELGIUM	"EU."
"A0848567,STEVEN	"HILLS	"27 RUE DES CEVENNES	"CARP ONT	"K0A 1L0	"CANADA	"NM.1.032007.092007"
"A0848599,WILLIAM FRANCIS	"HILLSON	"496 BEAVERTAIL RD RR #2	"QUEBEC	"CANADA	"NM."	"EU."
"A0848689,MAGNUS THOR	"HILLMARSSON	"21 FOREST RD DOLLARD DES ORMEAUX	"WINNIPEG MANITOBA	"CANADA	"NM."	"EU."
"A0848703,HOKST PETER	"HILMES	"20-479 ANSLEY ST	"REYKJAVIK	"109	"ICELAND	"EU."
"A0848734,DAVID WARREN	"HILSABECK	"3501 NESTLE KASSEL	"VOR DER MARTE	"GERMANY	"EU."	"EU."
"A0848836,RUDOLF ULRICH	"HILTBARNER	"140 WHITEFIELD CL ROSE NE	"CALGARY AB	"T1Y 4X7	"CANADA	"NM."
"A0848843,RAINER	"HILTEBRAND	"SCHMITZWEG 2	"MARWIL	"9562	"SWITZERLAND	"EU.1.12006.052007"
"A0848844,MICHAEL ADRIEN	"HILTEMANN	"KASERNENSTR 62	"8180 BULACH	"SWITZERLAND	"EU."	"EU."
"A0848880,ANTHONY JOHN	"HILTON	"32 HOLYROOD AVE	"OAKVILLE	"CANADA	"NM."	"EU."
"A0849100,RODNEY WILLIAM	"HILTON	"5 NOTTINGHAM MANSIONS NOTTINGHAM	"LONDON	"UNITED KINGDOM	"EU."	"EU."
"A0849443,GORDON EDWARD	"HILTON	"PO BOX SS 1945	"NASSAU	"BAHAMAS	"SO.2.072007.072008"	"EU."
"A0849701,FRANZ J	"HNOAKES	"134 KENNINGTON BAY	"MANITOBA R2N2L3	"CANADA	"NM."	"EU."
"A0849777,DONALD OWEN	"HINDELANG	"PO BOX 91	"JEDDAH	"SAUDI ARABIA	"EU."	"EU.3.112006.112008"
"A0849769,HASSAN MAHMOUD	"HINDI	"HELDON GROVE ERIJDE PARK RD	"BURRADO NSW2576	"AUSTRALIA	"WP."	"EU."
"A0849972,MICHAEL MCDONALD	"HINDLE	"52 EIGHTH AVENUE BARATARIA	"NARAMATA B C	"CANADA	"NM."	"EU."
"A0850020,DAVID WARWICK	"HINDSON	"RR 1	"KOWLOON	"HONG KONG	"WP."	"EU."
"A0850712,LEE CHI	"HING	"320 PRICE EDWARD RD FLAT 4	"KUALA LUMPUR	"MALAYSIA (ASIA)	"WP."	"EU."
"A0850714,LIM KHOY	"HING	"ROYAL SELANGOR FL YING CLUB	"NAIROBI	"KENYA	"EU."	"EU."
"A0850719,FRANCIS EDWARD KAPHIAN	"HINGER	"PO BOX 60246	"BAYREUTH	"95448	"GERMANY	"EU."
"A0850729,UDO PIERRE	"HINGER	"GERTIGWEG 6	"6250 LIMBURGLAHN	"GERMANY	"EU."	"EU."
"A0850741,BERN ALOYIS	"HINCOTT	"WESTERWALDSTRASSE 14	"625 LIMBURG 3	"GERMANY	"EU."	"EU."
"A0850810,HEINZ	"HINKEL	"KOBLENZERSTR 92	"5400 KOBLENZ	"GERMANY	"EU."	"EU."
"A0850878,BERNND	"HINKELMANN	"GLATZERSTRASSE 14				
"A0851620,JEFFREY NOLAN	"HINSON	"8 RTE DU VIN	"HEILIGENSTADT	"LUDENSBURG	"EU.1.022007.082007"	
"A0851736,HARMANNUS GERARDUS	"HINTIES	"RODE KLIF 146	"JELYSTAD	"NETHERLANDS	"EU."	"EU."
"A0852217,DENNIS HAROLD	"HIPPERN	"88 ARKLOW DR	"DARTMOUTH NS	"CANADA	"NM."	"EU."
"A0852313,KAZUNORI	"HIRAGA	"2-3-32 SEIWADAI-NISHI	"KAWANISHI CITY	"666-01	"JAPAN	"WP."
"A0852345,AKIHIRO	"HIRAO	"958 MORIO HYOGO 668-01	"TOYOKA	"JAPAN	"WP."	"EU."
"A0852372,TATEO	"HIRAYAMA	"ALL NIPPON AIRWAYS INC	"KUMAMOTO KEN	"JAPAN	"WP."	"EU."
"A0852397,JULIUCH	"HIRDES	"ESCHENSTR 24	"WIESBADEN	"GERMANY	"EU."	"EU."
"A0852411,PETER OWEN	"HIRE	"40 BECHPARK WAY WATFORD WD131TY	"HERTFORDSHIRE	"UNITED KINGDOM	"EU."	"EU."
"A0852419,ABDUREHMAN KARMALI	"HIRJI	"P O BOX 60528	"NAIROBI	"KENYA	"EU."	"EU."
"A0852447,GUIDO	"HIRNI	"ALLMENDSTRASSE 35	"3800 INTERLAKEN	"SWITZERLAND	"EU."	"EU."
"A0852486,SHINTI	"HIROSAWA	"488 SHIMONAKAYAMA SHIMODATESHI	"JBAKAKEN	"JAPAN	"WP."	"EU."
"A0852492,MURATA	"HIROSHI	"5-9-23-205 WARABI	"SAITAMA	"JAPAN	"WP."	"EU."

[illegible]



"A154928,DIETER ERICH	RAMSEGER	IN BREIL 3	6454-REICHKORF	GERMANY	EU	"
"A154997,JOHN ROBERT	RAMSHAW	"	MANCHESTER	UNITED KINGDOM	EU	"
"A1550063,TAHIR MAHMOOD	RANA	"	CHAH MIRAN LAHORE,	PAKISTAN	EU	"
"A1550101,ROBERT GRAHAM	RANCE	"	"SAI KUNG N T	"	"	"
"A1550313,ANTHONY PERCY	RANDALL	"	"KAITAK AIRPORT	"	"	"
"A1550328,BRYAN AUSTIN	RANDALL	"	"BEDFORDSHIRE	"	"	"
"A1551368,STANISLAS BERNARD	RANDUINEAU	"	"91200 ATHIS MONS,	"	"	"
"A1551562,JEAN G	RANGEL PATINO	"	"10 EL MEXICO DF	"	"	"
"A1551847,JANNICE RAE	RANKIN	"	"ST CATHARINE ONT,	"	"	"
"A1551865,LOBBIE RICHARD	RANKIN	"	"CALGARY ALBERTA	"	"	"
"A1552326,BARRY JOHN	RANSON	"	"WEST SUSSEX	"	"	"
"A1552482,TUFAIL AHMAD	RAO	"	"KARACHI	"	"	"
"A1552484,ISSAM TALK	RAOOF	"	"JIRAQ	"	"	"
"A1552638,GUGLIELMO	RAPCANO	"	"FUMICINO ROME	"	"	"
"A1552663,GIOACCHINO GINO	RAPINI	"	"ORTONA-CH 66026	"	"	"
"A1552701,IZAK	RAPOPORT	"	"ISRAEL	"	"	"
"A1552723,BERT WILLIAM	RAP	"	"ELLIOT LAKE ON	"	"	"
"A1552777,GERHARD	RAPP	"	"6730 NEW STADT 19,	"	"	"
"A1552932,SIEGFRIED FRANZ	RAPPEL	"	"FLIEBEN	"	"	"
"A1553012,LEVY CASTELLI VI	RAQUIZA	"	"QUEZON CITY	"	"	"
"A1553278,ALLAN VICTOR	RASH	"	"4860 AUSTRALIA	"	"	"
"A1553332,EDWARD PETER	RASHID	"	"AMMAN	"	"	"
"A1553372,MINAZ FAHEHALI	RASHID	"	"JEDDAH	"	"	"
"A1553378,SAAD	RASHID	"	"JEDDAH	"	"	"
"A1553379,IBRAHIM KHALIL	RASHIDI	"	"JEDDAH	"	"	"
"A1553380,ASADOLLAH	RASHIDIABRIZI	"	"DOHA	"	"	"
"A1553381,MOHAMMAD	RASHIDUDDIN	"	"KARACHI	"	"	"
"A1553398,SIVAKUMAR	RASIAH	"	"SINGAPORE	"	"	"
"A1553406,LAURENT CHARLES	RASMONT	"	"PARIS	"	"	"
"A1553550,BIORN ENGSTAD	RASMUSSEN	"	"JEDDAH	"	"	"
"A1553922,RICHARD LORNE	RASMUSSEN	"	"ALBERTA 78A07,	"	"	"
"A1554039,CARL BIARNI	RASMUSSEN	"	"GULDFORD SUREY,	"	"	"
"A1554060,TOMMIE	RASMUSSEN	"	"GUIN ZTX	"	"	"
"A1554124,EDGAR	RASPER	"	"GARDABAR 210	"	"	"
"A1554135,KLAUS DIETER	RASS	"	"26139 LANDSKRONA,	"	"	"
"A1554197,KARL HEINZ G	RASSART	"	"BREMEN 2800	"	"	"
"A1554230,NAVED IOBAL	RASUL	"	"6531 SCHWEPENHAU,	"	"	"
"A1554264,SURABHO	RATANAVIDAI	"	"JEDDAH	"	"	"
"A1554322,FRANCIS JOEL	RATCLIFF	"	"7500 KRUSLHUE 51,	"	"	"
"A1554334,FLOYD MALCOM	RATCLIFFE	"	"NAIROBI	"	"	"
"A1554351,SASHI BHUSAN	RATH	"	"BANGKOK 11	"	"	"
"A1554784,JUAN DEL CASTILLO	RATHMANN	"	"SAULT STE MARIE	"	"	"
"A1554809,THOMAS LEE	RATHWELL	"	"ONTARIO PON IKO	"	"	"
"A1554832,FRANCISCO JOSE	RATEVICIUS	"	"MANDELIEU	"	"	"
"A1555076,WIERA	RATTANASOPA	"	"DONCASTER	"	"	"
"A1555078,LIUPO	RATTAZZI	"	"MADRID	"	"	"
"A1555337,MANFRED	RAU	"	"CALGARY ALBERTA	"	"	"
"A15553509,ROLF GUNTHER	RAUCH	"	"ASUNCION	"	"	"
"A1555638,OTTO	RAUMHEIER	"	"BANGKOK AIRPORT	"	"	"
"A1555784,JOHANN	RAUSCH	"	"PARAGUAY	"	"	"
"A1555848,DIETER	RAUSCHEN	"	"LANDSHUT	"	"	"
"A1555994,FRANCISCO JOSE	RAVELO	"	"A 1130 VIENNA	"	"	"
"A1556009,KENNETH BURESS	RAVEN	"	"GROSSE STRASSE	"	"	"
"A1556029,GEORGES M J	RAVENEAU	"	"EL HATILLO CARACA	"	"	"
"A1556143,LISELOTTE	RAVN	"	"WIVENHOE ESSEX	"	"	"
"A1556167,KHALID AWAD	RAWAS	"	"ROISSY CEDEX	"	"	"
"A1556204,PETER DONALD	RAWINGS	"	"PUYRICARD	"	"	"
"A1556334,MARTIN PAUL	RAWINGS	"	"JEDDAH	"	"	"
"A1556343,PETER ALLAN	RAWLINGS	"	"TERRA COTTA ONT	"	"	"
"A1556412,KENNETH WILLIAM	RAWLINS	"	"COLCHESTER ESSEX	"	"	"
"A1556434,TERENCE JOHN	RAWLINS	"	"CHIPPENHAM WILTS	"	"	"
"A1557020,FRANCOIS	RAY	"	"MISSISSAUGA ONT	"	"	"
"A155767N,THOMAS GIBSON	RAY	"	"SKARINOU	"	"	"
		"	"8180 BUELACH	"	"	"
		"	"SWITZERLAND	"	"	"
		"	"SASK SAK 2B6	"	"	"
		"	"CANADA	"	"	"